

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

Deutsche Bank National Trust Company as  
Trustee for the Certificateholders of IMPAC  
Secured Assets Corp., Mortgage Pass-  
Through Certificates, Series 2006-4

CIVIL ACTION NO: 2:19-cv-00263-DBH

Plaintiff

**MOTION FOR ENTRY OF DEFAULT AS  
TO DEFENDANT, AMELIA D.  
McCARTHY**

vs.

Arthur C. McCarthy III and Amelia D.  
McCarthy

**RE:  
62 Wildbrook Lane, Eliot, ME 03903**

Defendants

Mortgage Electronic Registration Systems,  
Inc., as nominee for American Mortgage  
Express Corp.

**Mortgage:  
August 31, 2006  
Book 14944, Page 0679**

Party-In-Interest

NOW COMES the Plaintiff, Deutsche Bank National Trust Company as Trustee for the Certificateholders of IMPAC Secured Assets Corp., Mortgage Pass-Through Certificates, Series 2006-4 (hereinafter “Deutsche Bank”), pursuant to Fed. R. Civ. P. 55(a) and hereby moves for Default, following service, as to Defendant, Amelia D. McCarthy, since said Defendant has not answered nor otherwise appeared in this matter. As grounds therefore, Plaintiff states the following:

1. Plaintiff’s Complaint was filed on June 11, 2020.
2. The Defendant, Amelia D. McCarthy, was served with the subject complaint on December 9, 2019.
3. Proof of Service for Defendant, Amelia D. McCarthy, was filed on March 9, 2020.
4. The Defendant, Amelia D. McCarthy, is not in the military.
5. Plaintiff has brought this action to address five counts entitling it to various forms of relief

including Foreclosure; Breach of Note; Breach of Contract, Money Had and Received;

*Quantum Meruit*; and Unjust Enrichment.

6. By failing to appear in this matter, entry of default in favor of Plaintiff, pursuant to Fed. R. Civ. P. Rule 55(a) is proper against Defendant, Amelia D. McCarthy.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter default as to Defendant, Amelia D. McCarthy.

DATED: September 21, 2020

/s/Reneau J. Longoria, Esq.

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#### **CERTIFICATE OF SERVICE**

I, Reneau J. Longoria, Esq. hereby certify that on this 21<sup>st</sup> day of September, 2020, I served a copy of the above document by electronic notification using the CM/ECF system and/or First Class Mail to the following:

/s/Reneau J. Longoria, Esq.

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62 Wildbrook Lane  
Eliot, ME 03903

Arthur C. McCarthy III  
5 Stevens Court  
Exeter, NH 08333.

Amelia D. McCarthy  
7 Spinney Creek Road  
Eliot, ME 03903

Amelia D. McCarthy  
5 Stevens Court  
Exeter, NH 08333.

Mortgage Electronic Registration Systems, Inc.  
as nominee for American Mortgage Express Corp.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801